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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PORTIONS OF ITS
STATEMENT REGARDING QUESTIONS
IT INTENDS TO ASK ANTHONY
LEVANDOWSKI AT TRIAL**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal Portions of Its Statement Regarding Questions it Intends to Ask Anthony Levandowski at Trial
8 (the “Administrative Motion”). The Administrative Motion seeks an order sealing the following
9 materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Statement Regarding Questions it Intends to Ask Anthony Levandowski at Trial (“Waymo’s Statement”)	Highlighted Portions	Waymo (green highlighting); Uber ¹ (blue highlighting)

14 3. Waymo’s Statement (portions highlighted in green) contain or refer to trade secret and
15 confidential business information, which Waymo seeks to seal.

16 4. Waymo’s Statement (portions highlighted in green) contains, references, and/or
17 describes Waymo’s asserted trade secrets. The information Waymo seeks to seal includes the
18 confidential design and functionality of Waymo’s proprietary autonomous vehicle system, which
19 Waymo maintains as secret. I understand that these trade secrets are maintained as secret by Waymo
20 (Dkt. 25-47) and are valuable as trade secrets to Waymo’s business (Dkt. 25-31). The public
21 disclosure of this information would give Waymo’s competitors access to in-depth descriptions—and
22 analysis—of the functionality of Waymo’s autonomous vehicle system. If such information were
23 made public, I understand that Waymo’s competitive standing would be significantly harmed.

24 5. Waymo’s request to seal is narrowly tailored to those portions of the Statement that
25 merit sealing.
26

27 ¹ “Uber” means Uber Technologies, Inc., Ottomotto LLC, and Otto Trucking LLC, collectively.
28

7.

By /s/ Lindsay Cooper
Lindsay Cooper
Attorneys for WAYMO LLC

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

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